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13 Attorneys for Defendants ROYAL & SUN
14 ALLIANCE INSURANCE PLC (incorrectly
15 named herein as RSA INSURANCE GROUP);
16 CERTAIN UNDERWRITES AT LLOYD'S
17 LONDON as follows: LIBERTY SYNDICATE
18 4472 (incorrectly named herein as LIBERTY
19 SPECIALTYMARKETS INSURANCE GROUP),
20 NAVIGATORS SYNDICATE 1221 (incorrectly
21 named herein as NAVIGATORS UNDERWRITING
22 AGENCY LIMITED), BRIT SYNDICATE 2987
23 (incorrectly named herein as BRIT GLOBAL
24 SPECIALTY), and TRAVELERS SYNDICATE
25 5000 (incorrectly named herein as TRAVELERS
26 MARINE CARGO)

18 KUNDE ENTERPRISES, INC.; VINTAGE
WINE ESTATES, INC..

Case No. 3:19-cv-06636-SK

JOINDER IN NOTICE OF REMOVAL OF ACTION

19 Plaintiff(s),

Plaintiff(s).

V.

21 NATIONAL SURETY CORPORATION;
22 CERTAIN UNDERWRITES AT LLOYD'S
23 LONDON; RSA INSURANCE GROUP;
24 LIBERTY SPECIALTY MARKETS
25 INSURANCE GROUP; NAVIGATORS
UNDERWRITING AGENCY LIMITED;
BRIT GLOBAL SPECIALTY; TRAVELERS
MARINE CARGO.

Defendant(s).

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1 Defendants ROYAL & SUN ALLIANCE INSURANCE PLC (incorrectly named herein as
2 RSA INSURANCE GROUP) and CERTAIN UNDERWRITERS AT LLOYD'S LONDON as
3 follows: LIBERTY SYNDICATE 4472 (incorrectly named herein as LIBERTY SPECIALTY
4 MARKETS INSURANCE GROUP), NAVIGATORS SYNDICATE 1221 (incorrectly named herein
5 as NAVIGATORS UNDERWRITING AGENCY LIMITED), BRIT SYNDICATE 2987 (incorrectly
6 named herein as BRIT GLOBAL SPECIALTY), and TRAVELERS SYNDICATE 5000 (incorrectly
7 named herein as TRAVELERS MARINE CARGO) hereby join in Defendant NATIONAL SURETY
8 CORPORATION'S Notice of Removal to this Court of the state court action described in the said
9 Notice of Removal. Defendant CERTAIN UNDERWRITERS AT LLOYD'S LONDON is not a
10 separate entity, but simply a manner of referring collectively to the Lloyd's syndicates listed herein.

Respectfully submitted,

13 | Dated: October 17, 2019

GIBSON ROBB & LINDH LLP

/s/ G. GEOFFREY ROBB

G. GEOFFREY ROBB
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Attorney for Defendants ROYAL & SUN
ALLIANCE INSURANCE PLC and CERTAIN
UNDERWRITES AT LLOYD'S LONDON as
follows: LIBERTY SYNDICATE 4472;
NAVIGATORS SYNDICATE 1221,
BRIT SYNDICATE 2987; TRAVELERS
SYNDICATE 5000